

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

In re: BAIR HUGGER FORCED AIR
WARMING DEVICES PRODUCTS
LIABILITY LITIGATION

MDL No. 15-2666 (JNE/FLN)

This Document Relates To:
All Actions

**DEFENDANTS' MOTION FOR PROTECTIVE ORDER CONCERNING
PLAINTIFFS' JUNE 2018 SUBPOENAS TO W.J. MINKOWYCZ, Ph.D.
AND UNIVERSITY OF ST. THOMAS**

Pursuant to the Federal Rules of Civil Procedure 26(b)(4) and 26(c), and Local Rule 16.3, Defendants 3M Company and Arizant Healthcare Inc. (collectively, “Defendants”) respectfully move the Court for a protective order requiring Plaintiffs to withdraw their untimely and improper subpoenas to W.J. Minkowycz, Ph.D. and the University of St. Thomas. Plaintiffs should also be ordered to compensate Dr. Minkowycz and the University for the time spent and expense incurred in preparing a response to the improper subpoena, as Plaintiffs have previously been admonished regarding similar belated third-party discovery.

In support of this Motion, Defendants rely on the accompanying memorandum of law and the Declaration of Monica L. Davies, together with all prior proceedings and pleadings herein.

Dated: June 25, 2018

Respectfully submitted,

s/Monica L. Davies

Jerry W. Blackwell (MN #186867)
Benjamin W. Hulse (MN #0390952)
Mary S. Young (MN #0392781)
Monica L. Davies (MN #0315023)
BLACKWELL BURKE P.A.
431 South Seventh Street, Suite 2500
Minneapolis, MN 55415
Phone: (612) 343-3200
Fax: (612) 343-3205
Email: blackwell@blackwellburke.com
bhulse@blackwellburke.com
myoung@blackwellburke.com
mdavies@blackwellburke.com

Bridget M. Ahmann (MN #016611x)
FAEGRE BAKER DANIELS LLP
2200 Wells Fargo Center
90 South Seventh Street
Minneapolis, MN 55402
Phone: (612) 766-7000
Email: bridget.ahmann@faegrebd.com

***Counsel for Defendants 3M Company
and Arizant Healthcare Inc.***